1		The Honorable Richard A. Jones
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7	UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE	
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9	DEBORAH R. BEATON,	
10	Plaintiff,	No. 11-CV-872-RAJ
11	V.	DECLARATION OF COUNSEL, HEIDI E. BUCK, IN SUPPORT OF
12	JPMORGAN CHASE BANK, N.A.; and NORTHWEST TRUSTEE SERVICES, INC.,	DEFENDANT NORTHWEST TRUSTEE SERVICES, INC.'S REPLY
13	Defendants.	TO PLAINTIFF'S RESPONSE TO NORTHWEST TRUSTEE'S JOINDER
14	Berendants.	IN DEFENDANT JPMORGAN CHASE BANK, N.A.'S MOTION TO DISMISS
15		PLAINTIFF'S [FIRST] AMENDED COMPLAINT FOR DAMAGES
16)))
17	Heidi E. Buck declares as follows:	
18	1. I am the attorney for Defendant I	Northwest Trustee Services, Inc. ("Northwest
19	Trustee") herein and am competent to testify i	n the above-entitled action, and have personal
20	knowledge of the matters referred to herein.	
21	2. Prior to filing the response to the pending Motion to Dismiss and Joinder on February	
22	3, 2012, alleging Defendants had refused to participate in discovery, Plaintiff made no attempt to	
23	contact my office in regard to the apparent outstanding discovery responses. 3. At no time has Plaintiff made any attempt to meet and confer in regard to Plaintiff's	
24		
25	apparent discovery requests.	
26		
	DECLARATION OF HEIDI E. BUCK 1 of 2 CASE NO. 11-cv-872-RAJ	ROUTH 13555 SE 36th St., Ste 300 Bellevue, WA 98006 Telephone: 425.458.2121
		OLSEN, P.S. Facsimile: 425.458.2131

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4. On February 9, 2012, Northwest Trustee served on Plaintiff all documents it has in its possession which are responsive to the requests as well as notified Plaintiff of Defendant Northwest Trustee's objections thereto.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct. This declaration was executed this 10th day of February 2012 at Bellevue, Washington.

/s/ Heidi E. Buck

Heidi E. Buck, Declarant